

November 12, 2019

**Via ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

*Re: Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans (WC Docket No. 15-247); Special Access for Price Cap Local Exchange Carriers (WC Docket No. 05-25); AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services (RM 10-593); Technology Transitions (GN Docket No. 13-5); AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition (GN Docket No. 12-353)*

Dear Ms. Dortch,

Pursuant to the following Protective Orders, please find the attached certifications of compliance regarding the destruction of Confidential and Highly Confidential documents from the above-captioned proceedings:

- *Modified Protective Order*<sup>1</sup> in WC Docket No. 05-25, RM-10593
- *Second Protective Order*<sup>2</sup> in WC Docket No. 05-25, RM-10593
- *Data Collection Protective Order*<sup>3</sup> in WC Docket No. 05-25, RM-10593
- *Technology Transitions Protective Order*<sup>4</sup> in GN Docket Nos. 13-5 and 12-353
- *Second Technology Transitions Protective Order*<sup>5</sup> in GN Docket Nos. 13-5 and 12-353

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010).

<sup>2</sup> *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010).

<sup>3</sup> *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015).

<sup>4</sup> *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014).

<sup>5</sup> *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014).

- *Business Data Services Data Collection Protective Order*<sup>6</sup> in WC Docket No. 15-247
- *Tariff Investigation Protective Order*<sup>7</sup> in WC Docket No. 15-247.

By filing via ECFS, these certifications have been delivered to counsels for the Submitting Parties.

Please contact me if you have any questions about this submission.

Sincerely,



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Mengyu (Mary) Huang  
HARRIS, WILTSHIRE & GRANNIS LLP  
1919 M Street, NW, The Eighth Floor  
Washington, DC 20036  
mhuang@hwglaw.com

Enclosures

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<sup>6</sup> *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, App. A (Wireline Comp. Bur. 2015).

<sup>7</sup> *Id.* at App. B.

### CERTIFICATION

To the best of my knowledge and belief, I have destroyed or caused to be destroyed any Stamped Confidential and Highly Confidential Documents, and any material containing or derived from Confidential and Highly Confidential Information, and all copies of the same, to the extent required by the Protective Orders<sup>1</sup> in the above-captioned proceedings.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 12<sup>th</sup> day of November, 2019.



[Name] John T. Wakschatz

[Position] Partner

[Firm/Company] Harris, Wiltshire + Grannis LLP

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 5<sup>th</sup> day of November, 2019.

A handwritten signature in black ink, appearing to read "C. J. Wright", is written over a horizontal line.

Christopher J. Wright  
Partner  
Harris, Wiltshire & Grannis LLP

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of November, 2019.



Henry Shi  
Attorney  
Harris, Wiltshire & Grannis LLP

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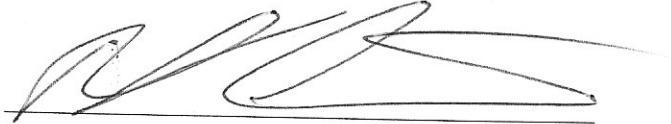
<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order and Tariff Investigation Protective Order*).

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 7<sup>th</sup> day of November, 2019.



Timothy J. Simeone  
Partner  
Harris, Wiltshire & Grannis, LLP

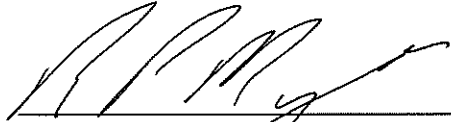
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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 7<sup>th</sup> day of November, 2019.



[Name]

[Position]

[Firm/Company]

Paul Maguire  
Attorney

Harris, Wiltshire & Grannis LLP

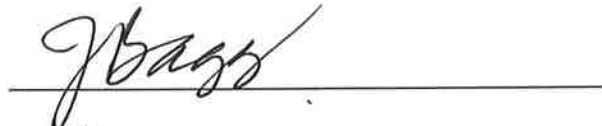
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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of November, 2019.



Jennifer Bagg

Partner

Harris, Wiltshire & Grannis LLP

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).



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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 12 day of November, 2019.



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Shiva Goel  
Partner  
Harris, Wiltshire & Grannis LLP  
*Counsel to Sprint Corporation*

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015).

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 11th day of November, 2019.



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Walter Anderson  
Partner  
Harris, Wiltshire & Grannis LLP

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 8 day of November 2019.

A handwritten signature in blue ink, reading "Mark D. Davis", is written over a horizontal line.

Mark D. Davis  
Partner  
Harris, Wiltshire & Grannis LLP

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order and Tariff Investigation Protective Order*).

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of November, 2019.



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William B. Sullivan  
Partner  
Harris, Wiltshire & Grannis LLP

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order and Tariff Investigation Protective Order*).

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of November, 2019.



Adrienne Fowler  
Partner  
Harris, Wiltshire & Grannis LLP

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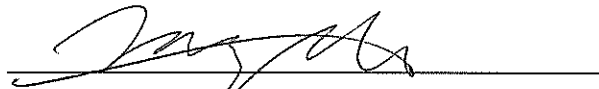
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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 7 day of November, 2019.



[Name] Mengyu Huang (Mary Huang)

[Position] Associate

[Firm/Company] Harris, Wiltshire & Grannis LLP

---

<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order* and *Tariff Investigation Protective Order*).

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 12th day of November, 2019.



[Name] Alexa Schneider

[Position] Legal Analyst

[Firm/Company] Harris, Wiltshire & Grannis LLP

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<sup>1</sup> *Special Access for Price Cap Local Exchange Carriers*, Modified Protective Order, DA 10-2075, 25 FCC Rcd. 15,168 (Wireline Comp. Bur. 2010); *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, DA 10-2419, 25 FCC Rcd. 17,725 (Wireline Comp. Bur. 2010); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Protective Order, DA 14-272, 29 FCC Rcd. 2014 (Wireline Comp. Bur. 2014); *Technology Transitions; AT&T Petition to Launch a Proceeding Concerning the TDM-to-IP Transition*, Second Protective Order, DA 14-273, 29 FCC Rcd. 2022 (Wireline Comp. Bur. 2014); *Special Access for Price Cap Local Exchange Carriers*, Order and Data Collection Protective Order, DA 14-1424, 30 FCC Rcd. 11,657 (Wireline Comp. Bur. 2015); *Investigation of Certain Price Cap Local Exchange Carrier Business Data Services Tariff Pricing Plans*, Order and Protective Orders, DA 15-1387, 30 FCC Rcd. 13,680, Apps. A & B (Wireline Comp. Bur. 2015) (*Business Data Services Data Collection Protective Order and Tariff Investigation Protective Order*).

## CERTIFICATION

The following individuals that signed onto the Protective Orders<sup>1</sup> are no longer at Harris, Wiltshire & Grannis LLP. To the best of my knowledge and belief, Stamped Confidential and Highly Confidential Documents, and any material containing or derived from Confidential and Highly Confidential Information, and all copies of the same, from their tenure at the firm have been destroyed to the extent required by the Protective Orders.

- E. Austin Bonner
- Elizabeth B. Uzelac
- YuXi Tian
- Susannah Larson
- Rachel W. Petty
- Abigail D. Hylton
- Alexandra B. Green
- April E. Smith
- Alexandra D. Tate
- Caitlin-Jean A. Juricic
- Caroline R. Schuitema
- Jordan A. Rudinsky
- Jill R. Warnock
- Madeleine M. Salinas
- Remington R. Pool
- Sora M. Park
- Sameer R. Aggarwal
- William L. Hupp
- Elizabeth C. Marley
- Emilie M. Kormienko
- Antonia M. Lluberes
- Jessica K. Parent

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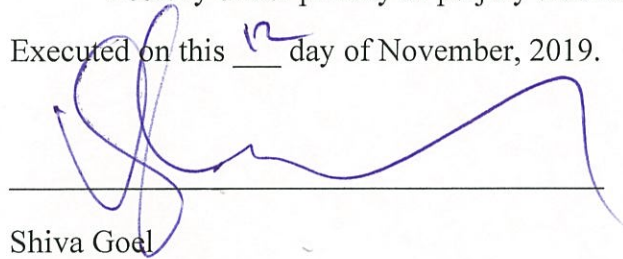
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- Kara A. Trivolis
- Thomas G. Reid
- Vira Tarnavska
- Anne Menasche
- Yana C. Vierboom
- Berkeley S. Hirsch
- Katherine E. Geithman
- Madeleine M. Lottenbach
- Caitlin McDonnell
- Jason St. John

I certify under penalty of perjury that the foregoing is true and correct.

Executed on this 12 day of November, 2019.



Shiva Goel  
Partner  
Harris, Wiltshire & Grannis LLP